

# **STUDY DATA TECHNICAL CONFORMANCE GUIDE**

## *Technical Specifications Document*

This Document is incorporated by reference into the following  
Guidance Document(s):

### **Guidance for Industry *Providing Regulatory Submissions in Electronic Format – Standardized Study Data***

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**U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Drug Evaluation and Research (CDER)  
Center for Biologics Evaluation and Research (CBER)**

**June 2015**



# **STUDY DATA TECHNICAL CONFORMANCE GUIDE**

**June 2015**

## Revision History

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January 2014	1.0	Initial Version
December 2014	2.0	Revisions based on the public comment period (February 2014 – May 2014); and CDER/CBER internal review May 2014 – December 2014
March 2015	2.1	Revisions based on comments received to version 2.0. Updates to Sections 2.2 Study Data Reviewer's Guide (SDRG), 2.3 Analysis Data Reviewer's (ADRG), 3.3.1 SAS Transport Format, 3.3.2. Dataset Size and a revision of Section 4.1.4.5 Data Definition File
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## Table of Contents

<b>1.</b>	<b>Introduction .....</b>	<b>1</b>
1.1	Background.....	1
1.2	Purpose.....	1
1.3	Document Revision and Control.....	2
1.4	Organization and Summary of the Guide.....	2
1.5	Relationship to Other Documents.....	3
<b>2.</b>	<b>Planning and Providing Standardized Study Data .....</b>	<b>4</b>
2.1	Study Data Standardization Plan .....	4
2.2	Study Data Reviewer's Guide .....	4
2.3	Analysis Data Reviewer's Guide.....	5
<b>3.</b>	<b>Exchange Format – Electronic Submissions .....</b>	<b>6</b>
3.1	Extensible Mark-up Language.....	6
3.2	Portable Document Format.....	6
3.3	File Transport Format .....	6
3.3.1	SAS Transport Format .....	6
3.3.2	Dataset Size.....	7
3.3.3	Dataset Column Length .....	7
3.3.4	Variable and Dataset Descriptor Length.....	7
3.3.5	Special Characters: Variables and Datasets .....	7
3.3.6	Variable and Dataset Names .....	7
3.3.7	Variable and Dataset Labels .....	8
<b>4.</b>	<b>Study Data Submission Format – Clinical and Nonclinical .....</b>	<b>8</b>
4.1	Clinical Data Interchange Standards Consortium.....	8
4.1.1	Study Data Tabulation Model .....	9
4.1.1.1	Definition.....	9
4.1.1.2	SDTM General Considerations .....	9
4.1.1.3	SDTM Domain Specifications.....	10
4.1.2	Analysis Data Model.....	12
4.1.2.1	Definition.....	12
4.1.2.2	General Considerations.....	12

4.1.2.3	Key Efficacy and Safety Variables .....	12
4.1.2.4	Timing Variables .....	12
4.1.2.5	Core Variables .....	13
4.1.2.6	Dates .....	13
4.1.2.7	Labels.....	13
4.1.2.8	Software Programs .....	13
4.1.2.9	ADaM Dataset Specifications .....	14
4.1.2.9.1	Subject Level Analysis Data.....	14
4.1.2.9.2	Imputed Data.....	14
4.1.3	Standard for Exchange of Nonclinical Data .....	14
4.1.3.1	Definition.....	14
4.1.3.2	General Considerations.....	14
4.1.3.3	SEND Domain Specification.....	15
4.1.4	General Considerations: SDTM, SEND, and/or ADaM.....	15
4.1.4.1	Variables in SDTM and SEND: Required, Expected, and Permissible .....	15
4.1.4.2	Dates in SDTM and SEND.....	16
4.1.4.3	Naming Conventions in SDTM and SEND.....	16
4.1.4.4	SDTM and SEND Versions.....	17
4.1.4.5	Data Definition Files for SDTM, SEND, and ADaM .....	17
4.1.4.6	Annotated Case Report Form (aCRF) for SDTM .....	18
<b>5.</b>	<b>Therapeutic Area Standards .....</b>	<b>18</b>
<b>5.1</b>	<b>General .....</b>	<b>18</b>
<b>6.</b>	<b>Terminology .....</b>	<b>19</b>
<b>6.1</b>	<b>General .....</b>	<b>19</b>
6.1.1	Controlled Terminologies .....	19
6.1.2	Use of Controlled Terminologies.....	20
6.1.3	Maintenance of Controlled Terminologies .....	20
<b>6.2</b>	<b>CDISC Controlled Terminology .....</b>	<b>21</b>
<b>6.3</b>	<b>Adverse Events .....</b>	<b>21</b>
6.3.1	MedDRA.....	21
6.3.1.1	General Considerations.....	21

<b>6.4</b>	<b>Medications .....</b>	<b>22</b>
6.4.1	FDA Unique Ingredient Identifier .....	22
6.4.1.1	General Considerations.....	22
6.4.2	WHO Drug Dictionary.....	22
6.4.2.1	General Considerations.....	22
<b>6.5</b>	<b>Pharmacologic Class .....</b>	<b>23</b>
6.5.1	National Drug File -- Reference Terminology.....	23
6.5.1.1	General Considerations.....	23
<b>6.6</b>	<b>Indication .....</b>	<b>23</b>
6.6.1	SNOMED CT.....	23
6.6.1.1	General Considerations.....	23
<b>6.7</b>	<b>Laboratory Tests .....</b>	<b>24</b>
6.7.1	LOINC .....	24
6.7.1.1	General Considerations .....	24
<b>7.</b>	<b>Electronic Submission Format .....</b>	<b>24</b>
<b>8.</b>	<b>Data Validation and Traceability.....</b>	<b>27</b>
<b>8.1</b>	<b>Definition of Data Validation .....</b>	<b>27</b>
<b>8.2</b>	<b>Study Data Validation Rules .....</b>	<b>27</b>
8.2.1	Types of Data Validation Rules.....	27
8.2.2	Support on Data Validation Rules .....	28
<b>8.3</b>	<b>Study Data Traceability .....</b>	<b>28</b>
8.3.1	Overview .....	28
8.3.2	Legacy Study Data Conversion to Standardized Study Data.....	29
8.3.2.1	Traceability Issues with Legacy Data Conversion .....	29
8.3.2.2	Legacy Data Conversion Plan and Report.....	30
<b>Appendix:</b>	<b>Data Standards and Interoperable Data Exchange.....</b>	<b>32</b>
<b>Glossary</b>	<b>.....</b>	<b>35</b>

## STUDY DATA TECHNICAL CONFORMANCE GUIDE

This technical specifications document represents the Food and Drug Administration's (FDA's) current thinking on this topic. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach, contact the FDA staff responsible for implementing this guidance. If you cannot identify the appropriate FDA staff, send an email to [cder-edata@fda.hhs.gov](mailto:cder-edata@fda.hhs.gov) or [cber.cdisc@fda.hhs.gov](mailto:cber.cdisc@fda.hhs.gov).

### 1. Introduction

#### 1.1 Background

This Study Data Technical Conformance Guide (Guide) provides specifications, recommendations, and general considerations on how to submit standardized study data using FDA-supported<sup>1</sup> data standards located in the **Data Standards Catalog** (*Standards Catalog*).<sup>2</sup> The Guide supplements the guidance for industry *Providing Regulatory Submissions in Electronic Format — Standardized Study Data* (eStudy Data). The eStudy Data guidance will implement the electronic submission requirements of section 745A(a) of the FD&C Act with respect to standardized study data contained in certain investigational new drug applications (INDs), new drug applications (NDAs); abbreviated new drug applications (ANDAs); and certain biologics license applications (BLAs) that are submitted to the Center for Drug Evaluation and Research (CDER) or the Center for Biologics Evaluation and Research (CBER).<sup>3</sup>

#### 1.2 Purpose

This Guide provides technical recommendations to sponsors<sup>4</sup> for the submission of animal and human study data and related information in a standardized electronic format in INDs, NDAs, ANDAs, and BLAs. The Guide is intended to complement and promote interactions between sponsors and FDA review divisions. However, it is not intended to replace the need for sponsors to communicate directly with review divisions regarding implementation approaches or issues relating to data standards. To better understand why the FDA is now emphasizing the submission of standardized data for all studies, please refer to the Appendix.

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<sup>1</sup> For the purposes of this document, “supported” means the receiving Center has established processes and technology to support receiving, processing, reviewing, and archiving files in the specified file format.

<sup>2</sup> Available at <http://www.fda.gov/forindustry/datastandards/studydatastandards/default.htm>.

<sup>3</sup> See *Providing Regulatory Submissions in Electronic Format — Standardized Study Data* (section II.A) available at <http://www.fda.gov/forindustry/datastandards/studydatastandards/default.htm>.

<sup>4</sup> For the purposes of this document, the term “sponsor” refers to both “sponsors” and “applicants” who are submitting study data to the Agency.

Because of the inherent variability across studies and applications, it is difficult to identify all data needed by a review division prior to a scientific regulatory review. We recommend that as early as the pre-IND meeting, sponsors should use the established regulatory process to discuss with the review division the key data necessary to support a submission, the data elements that should be included in each dataset, and the organization of the data within the datasets.

Some data standards may not require the use of all defined data elements to be collected in any given study. For example, the Study Data Tabulation Model Implementation Guide (SDTMIG)<sup>5</sup> classifies variables as required, expected, or permissible. *What* data are collected and submitted is a decision that should be made based on scientific reasons, regulation requirements, and discussions with the review division. However, all study-specific data necessary to evaluate the safety and efficacy of the medical product should be submitted in conformance with the standards currently supported by FDA and listed in the *Standards Catalog*.

If there is a question regarding a specific submission or a particular data standard implementation, the sponsor should contact the review division for specific submission questions or the appropriate contact for data standards issues (cdere-data@fda.hhs.gov or cber.cdisc@fda.hhs.gov).

This Guide supersedes all previous Study Data Specifications documents (Versions 1.0 - 2.0) and CDER Study Data Common Issues Documents (Versions 1.0 -1.1).

### **1.3 Document Revision and Control**

FDA intends to post updated versions of the Guide to the **Study Data Standards Resources Web page** (Standards Web page)<sup>6</sup> followed by *Federal Register* notices announcing updated versions. The revision history page of the Guide will contain sufficient information on the changes made by section.

### **1.4 Organization and Summary of the Guide**

This document is organized as follows:

Section 1: **Introduction** – provides information on regulatory policy and guidance background, purpose, and document control.

Section 2: **Planning and Providing Standardized Study Data** – recommends and provides details on preparing an overall study data standardization plan, a study data reviewer's guide and an analysis data reviewer's guide.

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<sup>5</sup> See <http://www.cdisc.org>.

<sup>6</sup> The Standards Web page can be accessed at <http://www.fda.gov/forindustry/datastandards/studydatastandards/default.htm>.



- Section 3: **Exchange Format - Electronic Submissions** – presents the specifications, considerations, and recommendations for the file formats currently supported by FDA.
- Section 4: **Study Data Submission Format: Clinical and Nonclinical** – presents general considerations and specifications for sponsors using, for example, the following standards for the submission of study data: Study Data Tabulation Model (SDTM), Analysis Data Model (ADaM), and Standard for Exchange of Nonclinical Data (SEND).
- Section 5: **Therapeutic Area Standards** – presents supplemental considerations and specific recommendations when sponsors submit study data using FDA-supported therapeutic area standards (TA).
- Section 6: **Terminology** – presents general considerations and specific recommendations when using controlled terminologies/vocabularies for clinical trial data.
- Section 7: **Electronic Submission Format** – provides specifications and recommendations on submitting study data using the electronic Common Technical Document (eCTD) format.
- Section 8: **Data Validation and Traceability** – provides general recommendations on conformance to standards, data validation rules, data traceability expectations, and legacy data conversion.

### **1.5 Relationship to Other Documents**

This Guide integrates and updates information discussed previously in the Study Data Specifications and the CDER Common Data Standards Issues documents.<sup>7</sup> As noted above, this Guide supersedes all previous Study Data Specifications documents (Versions 1.0 - 2.0) and CDER Study Data Common Issues Documents (Versions 1.0 -1.1). The examples of issues and concerns discussed in the Guide are intended as examples only of common issues, and not an inclusive list of all possible issues.

This Guide is incorporated by reference into the Guidance to Industry *Providing Regulatory Submissions in Electronic Format: Standardized Study Data*. In addition, sponsors should reference the following:

- FDA Study Data Standards Resources Web page (See section 1.1)
- FDA Data Standards Catalog (See section 1.1)
- FDA Portable Document Format Specifications (See section 3.2)

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<sup>7</sup> See

<http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/ucm248635.htm>.

- Guidance to Industry Providing Regulatory Submissions in Electronic Format: *Submissions Under Section 745A(a) of the Federal Food, Drug, and Cosmetic Act*<sup>8</sup>
- Guidance to Industry *Providing Regulatory Submissions in Electronic Format: Certain Human Pharmaceutical Product Applications and Related Submissions Using the Electronic Common Technical Document Specifications*<sup>9</sup>

## **2. Planning and Providing Standardized Study Data**

### **2.1 Study Data Standardization Plan**

For clinical and nonclinical studies, sponsors should include a plan (e.g., in the IND) describing the submission of standardized study data to FDA. The Study Data Standardization Plan (*Standardization Plan*) assists FDA in identifying potential data standardization issues early in the development program. Sponsors may also initiate discussions at the pre-IND stage. For INDs, the *Standardization Plan* should be located in the general investigational plan. The *Standardization Plan* should include, but is not limited to the following:

1. List of the planned studies
2. Type of studies (e.g., phase I, II or III)
3. Study designs (e.g., parallel, cross-over, open-label extension)
4. Planned data standards, formats, and terminologies and their versions or a justification of studies that may not conform to the currently supported standards

The FDA's Study Data Standards Resources Web page provides recommendations for preparing a Study Data Standardization Plan<sup>10</sup>

The *Standardization Plan* should be updated in subsequent communications with FDA as the development program expands and additional studies are planned. Updates to the *Standardization Plan* should not be communicated each time a study is started. The cover letter accompanying a study data submission should describe the extent to which the latest version of the *Standardization Plan* was executed.

### **2.2 Study Data Reviewer's Guide**

The preparation of a Study Data Reviewer's Guide (SDRG)<sup>11</sup> is recommended as an integral part of a standards-compliant study data submission. The SDRG should

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<sup>8</sup> <http://www.fda.gov/downloads/Drugs/Guidances/UCM384686.pdf>

<sup>9</sup> <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM333969.pdf>

<sup>10</sup> <http://www.fda.gov/forindustry/datastandards/studydatastandards/default.htm>

<sup>11</sup> A specific template for a Study Data Reviewer's Guide is not specified. However, an example of a Study Data Reviewer's Guide (template, completion guidelines and examples) can be found at [http://www.phusewiki.org/wiki/index.php?title=Study\\_Data\\_Reviewer's\\_Guide](http://www.phusewiki.org/wiki/index.php?title=Study_Data_Reviewer's_Guide).

describe any special considerations or directions that may facilitate an FDA reviewer's use of the submitted data and may help the reviewer understand the relationships between the study report and the data.<sup>12</sup> The SDRG should include, but is not limited to the following:

1. Study protocol title, number, and version
2. Study design
3. Standards, formats, and terminologies and their versions
4. Description of study datasets
5. Data standards validation rules, versions, and issues
6. Description of all sponsor decisions related to data standard implementations

The SDRG for nonclinical and clinical studies should be placed with the study data in Module 4 and 5, respectively, of the Electronic Common Technical Document (eCTD).<sup>13</sup>

### **2.3 Analysis Data Reviewer's Guide**

The preparation of an Analysis Data Reviewer's Guide (ADRG)<sup>14</sup> is recommended as an important part of a standards-compliant analysis data submission. The ADRG provides FDA reviewers with context for analysis datasets and terminology, received as part of a regulatory product submission, additional to what is presented within the data definition file (i.e., define.xml). The ADRG also provides a summary of ADaM conformance findings. The ADRG purposefully duplicates limited information found in other submission documentation (e.g., the protocol, statistical analysis plan, clinical study report, define.xml) in order to provide FDA reviewers with a single point of orientation to the analysis datasets. It should be noted that the submission of an ADRG does not eliminate the requirement to submit a complete and informative define.xml file corresponding to the analysis datasets.

The ADRG for a clinical study should be placed with the analysis data in Module 5 of the Electronic Common Technical Document (eCTD).

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<sup>12</sup> For submissions to CBER, sponsors and applicants should continue to provide the Data Interpretation and Validation Report (DIVR). The DIVR can be incorporated into the Study Data Reviewer's Guide. The DIVR can be found at

<http://www.fda.gov/BiologicsBloodVaccines/DevelopmentApprovalProcess/ucm209137.htm>

<sup>13</sup> The Study Data Reviewer's Guides are separate from an overall reviewer's guide that may be placed in Module 1 of the eCTD.

<sup>14</sup> A specific template for an Analysis Data Reviewer's Guide is not specified. However, an example of an Analysis Data Reviewer's Guide (template, completion guidelines and examples) can be found at

[http://www.phusewiki.org/wiki/index.php?title=Analysis\\_Data\\_Reviewer's\\_Guide](http://www.phusewiki.org/wiki/index.php?title=Analysis_Data_Reviewer's_Guide).

### 3. Exchange Format – Electronic Submissions

#### 3.1 Extensible Mark-up Language

Extensible Mark-up Language (XML), as defined by the World Wide Web Consortium (W3C), specifies a set of rules for encoding documents in a format that is both human-readable and machine-readable.<sup>15,16</sup> XML's primary purpose is to facilitate the sharing of structured data across different information systems. An XML use case is CDISC's define.xml file. All XML files should use .xml as the file extension. Although XML files can be compressed, the define.xml should not be compressed.

#### 3.2 Portable Document Format

Portable Document Format (PDF) is an open file format used to represent documents in a manner independent of application software, hardware, and operating systems.<sup>17</sup> A PDF use case includes, e.g., the annotated CRF (aCRF / blankcrf), and other documents that align with the International Conference on Harmonization (ICH) M2.<sup>18</sup> FDA PDF specifications are located on FDA's Electronic Common Technical Document (eCTD) Web site.<sup>19</sup> The *Standards Catalog* lists the PDF version(s) that are supported by FDA. All PDF files should use .pdf as the file extension.

#### 3.3 File Transport Format

##### 3.3.1 SAS Transport Format

The SAS Transport Format (XPORT) Version 5, is the file format for the submission of all electronic datasets.<sup>20</sup> The XPORT is an open file format published by SAS Institute for the exchange of study data. Data can be translated to and from XPORT to other commonly used formats without the use of programs from SAS Institute or any specific vendor. There should be one dataset per transport file, and the dataset in the transport file should be named the same as the transport file (e.g., "ae" and ae.xpt, "suppae" and suppae.xpt).

XPORT files can be created by the COPY Procedure in SAS Version 5, Version 6 and higher of the SAS Software. SAS Transport files processed by the SAS CPORT cannot be reviewed, processed, or archived by FDA. Sponsors can find the record layout for SAS XPORT transport files through SAS technical document TS-140.<sup>21</sup>

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<sup>15</sup> See <http://en.wikipedia.org/wiki/XML>.

<sup>16</sup> See <http://www.w3.org/XML/>.

<sup>17</sup> Adobe Systems Incorporated, PDF Reference, sixth edition, version 1, Nov. 2006, p. 33.

<sup>18</sup> See <http://www.ich.org/products/electronic-standards.html>.

<sup>19</sup> Available at

<http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/ucm153574.htm>

<sup>20</sup> See <http://www.sas.com>

<sup>21</sup> Available at [http://support.sas.com/techsup/technote/ts140\\_2.pdf](http://support.sas.com/techsup/technote/ts140_2.pdf)

All SAS XPORT transport files should use .xpt as the file extension. There should be one dataset per XPORT file and the files should not be compressed.

### **3.3.2 Dataset Size**

Each dataset should be provided in a single transport file. The maximum size of an individual dataset that FDA can process depends on many factors. Datasets greater than 1 gigabyte (gb) in size should be split into smaller datasets no larger than 1 gb. Sponsors should submit these smaller datasets, in addition to the larger non-split datasets, to better support regulatory reviewers. The split datasets should be placed in a separate sub-directory labeled “split” (See section 7). Clear explanation regarding how these datasets were split needs to be presented within the relevant data reviewer’s guide (i.e., SDRG or ADRG).

### **3.3.3 Dataset Column Length**

The allotted length for each column containing character (text) data should be set to the maximum length of the variable used across all datasets in the study. This will significantly reduce file sizes. For example, if USUBJID has a maximum length of 18, the USUBJID’s column size should be set to 18, not 200.

### **3.3.4 Variable and Dataset Descriptor Length**

The length of variable names, descriptive labels, and dataset labels should not exceed the maximum permissible number of characters described below.

**Table 1: Maximum Length of Variables and Dataset Elements**

<b>Element</b>	<b>Maximum Length in Characters</b>
Variable Name	8
Variable Descriptive Label	40
Dataset Label	40

### **3.3.5 Special Characters: Variables and Datasets**

Variable names, as well as variable and dataset labels should include American Standard Code for Information Interchange (ASCII) text codes only.

### **3.3.6 Variable and Dataset Names**

Variable and dataset names should not contain punctuation, dashes, spaces, or other non-alphanumeric symbols. In addition, the variable and dataset names should not contain special characters, including:

<code>\ / * , ? &lt; &gt;   “ ” : % # + ( ) { } [ ]</code>
------------------------------------------------------------

### **3.3.7 Variable and Dataset Labels**

Variable and dataset labels can include punctuation characters. However, special characters should not be provided, such as,

1. Unbalanced apostrophe, e.g., Parkinson's.
2. Unbalanced single and double quotation marks.
3. Unbalanced parentheses, braces or brackets, e.g., '(', '{' and '['.
4. '<' less-than sign and '>' greater-than sign.

## **4. Study Data Submission Format – Clinical and Nonclinical**

### **4.1 Clinical Data Interchange Standards Consortium**

Clinical Data Interchange Standards Consortium (CDISC) is an open, multidisciplinary, neutral, nonprofit standards development organization (SDO) that has been working through consensus-based collaborative teams to develop global data standards for clinical and nonclinical research.<sup>22</sup>

Data format specifications for the tabulation datasets of clinical and nonclinical toxicology studies are provided by SDTM and SEND, respectively, while data format specifications for the analysis datasets of clinical studies are provided by ADaM. It should be noted that data format specifications for the analysis datasets of nonclinical toxicology studies have not been developed yet. As noted in section 1.1, the *Standards Catalog* provides a listing of the currently supported data standards with links to reference materials.

Although the SDTM and SEND formats facilitate review of the data, they do not always provide the data structured in a way that supports all analyses needed for review. Analysis files are critical for FDA to understand, on a per subject basis, how the specific analyses contained in the study report have been created. Therefore, sponsors should supplement the SDTM with ADaM analysis datasets as described below.

There may be instances in which current implementation guides (e.g., SDTMIG, SENDIG) do not provide specific instruction as to how certain study data should be represented. In these instances, sponsors should discuss their proposed solution with the review division and submit supporting documentation that describes these decisions or solutions in the SDRG at the time of submission.

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<sup>22</sup> See <http://www.cdisc.org>.

## **4.1.1 Study Data Tabulation Model**

### **4.1.1.1 Definition**

The Study Data Tabulation Model (SDTM) defines a standard structure for human clinical trials tabulation datasets.

### **4.1.1.2 SDTM General Considerations**

It is recommended that sponsors implement the SDTM standard for representation of clinical trial tabulation data prior to the conduct of the study. The use of case report forms that incorporate SDTM standard data elements (e.g., Clinical Data Acquisition Standards Harmonization (CDASH)) allows for a simplified process for the creation of SDTM domains.

The SDTMIG should be followed unless otherwise indicated in this Guide or in the *Standards Catalog*. The conformance criteria listed in the SDTMIG should not be interpreted as the sole determinant of the adequacy of submitted data. If there is uncertainty regarding implementation, the sponsor should discuss application-specific questions with the review division and general standards implementation questions with the specific center resources identified elsewhere in this Guide (See section 1.2). No data should be imputed in SDTM datasets. Data should only be imputed in ADaM datasets (See section 4.1.2.9.2).

Except for variables that are defined in the SDTMIG as being coded, no numerically coded variables should typically be submitted as part of the SDTM datasets. Numeric values generated from validated scoring instruments or questionnaires do not represent codes, and therefore have no relevance for this issue. There may be special instances when codes are preferred, hence sponsors should refer to the review division for direction, if there are any questions.

#### **Subject Identifier (SUBJID)**

The SUBJID is an ID of the entity (i.e., person) that participates in a trial. If the same subject is screened more than once in a trial, then the subject's SUBJID should be different.

#### **Unique Subject Identifier (USUBJID)**

Each individual subject should be assigned a single unique identifier across the entire application. This is in addition to the subject ID (SUBJID) used to identify subjects in each study and its corresponding study report. An individual subject should have the exact same unique identifier across all datasets, including between SDTM and ADaM datasets. Subjects that participate in more than one study should maintain the same USUBJID across all studies. It is important to follow this convention to enable pooling of a single subject's data across studies (e.g., a randomized control trial and an extension study).

Sponsors should not add leading or trailing spaces to the USUBJID variable in any dataset. For example, applications have been previously submitted in which the

USUBJID variable for each individual subject appeared to be the same across datasets; however, in certain datasets, the actual entry had leading zeros added, or zeros added elsewhere in the entry. This does not allow for machine-readable matching of individual subject data across all datasets. Improper implementation of the USUBJID variable is a common error with applications and often requires sponsors to re-submit their data.

#### Adjudication Data

There are no existing standards or best practices for the representation of adjudication data as part of a standard data submission. Until standards for adjudication data are developed, it is advised that sponsors discuss their proposed approach with the review division and also include details about the presence, implementation approach, and location of adjudication data in the SDRG.

#### **4.1.1.3 SDTM Domain Specifications**

##### SUPPQUAL (Supplemental Qualifier)

A SUPPQUAL dataset is a special SDTM dataset that contains non-standard variables which cannot be represented in the existing SDTM domains. SUPPQUAL should be used only when key data cannot be represented in SDTM domains. In general, variables used to support key analyses should not be represented in SUPPQUAL. Discussion with the review division should occur if the sponsor intends to include important variables (e.g., that support key analyses) in SUPPQUAL datasets, and reflected in the SDRG.

##### DM Domain (Demographics)

In the DM domain, each subject should have only one single record per study.

Screen failures, when provided, should be included as a record in DM with the ARM field left blank. For subjects who are randomized in treatment group but not treated, the planned arm variables (ARM and ARMCD) should be populated, but actual treatment arm variables (ACTARM and ACTARMCD) should be left blank.<sup>23</sup>

##### DS Domain (Disposition)

When there is more than one disposition event, the EPOCH variable should be used to aid in distinguishing between them. This will allow identification of the EPOCH in which each event occurred. If a death of any type occurs, it should be the last record and should include its associated EPOCH. It is expected that EPOCH variable values will be determined based on the trial design and thus should be defined clearly and documented in the define.xml.

##### SE Domain (Subject Elements)

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<sup>23</sup> Although this convention is inconsistent with the SDTMIG, FDA recommends its use so that “Screen Failure” is not specified as a treatment arm.



The Subject Elements domain should be included to aid in the association of subject data (e.g., findings, events, and interventions) with the study element in which they occurred.

#### AE Domain (Adverse Events (AE))

Currently, there is no variable in the AE domain that indicates if an AE was “treatment-emergent.” The AE domain should include all adverse events that were recorded in the subjects’ case report forms, regardless of whether the sponsor determined that particular events were or were not treatment-emergent.

The entry of a “Y” for the serious adverse event variable, AESER, should have the assessment indicated, (e.g., as a death, hospitalization, or disability/permanent damage). Frequently, sponsors omit the assessment information, even when it has been collected on the CRF. The criteria that led to the determination should be provided. This information is critical during FDA review to support the characterization of serious AEs.

#### Custom Domains

The SDTMIG permits the creation of custom domains if the data do not fit into an existing domain. Prior to creating a custom domain, sponsors should confirm that the data do not fit into an existing domain. If it is necessary to create custom domains, sponsors should follow the recommendations in the SDTMIG. In addition, sponsors should present their implementation approach in the SDRG.

#### LB Domain (Laboratory)

The size of the LB domain dataset submitted by sponsors is often too large to process (See section 3.3.2). This issue can be addressed by splitting a large LB dataset into smaller datasets according to LBCAT and LBSCAT, using LBCAT for initial splitting. If the size is still too large, then use LBSCAT for further splitting. For example, use the dataset name lb1.xpt for chemistry, lb2.xpt for hematology, and lb3.xpt for urinalysis. Splitting the dataset in other ways (e.g., by subject or file size) makes the data less useable. Sponsors should submit these smaller files in addition to the larger non-split standard LB domain file. Sponsors should submit the split files in a separate sub-directory/split that is clearly documented in addition to the non-split standard LB domain file in the SDTM datasets directory (See section 7).

#### Trial Design

All Trial Design datasets should be included in SDTM submissions as a way to describe the planned conduct of a clinical trial..

#### EC Domain (Exposure as Collected)

The Exposure as Collected domain provides for protocol-specified study treatment administrations, as-collected. The EC domain may address some challenges in providing a subject’s exposure to study medication. However, testing and acceptance has not been completed on the EC and it is not supported at this time.

#### DD (Death Details)

The Death Details domain provides for supplemental data that are typically collected when a death occurs, such as the official cause of death. The DD domain may have not completed testing and acceptance and it is not supported at this time.

### **4.1.2 Analysis Data Model**

#### **4.1.2.1 Definition**

Specifications for analysis datasets for human drug product clinical studies are provided by the Analysis Data Model (ADaM) and its implementation by the ADaMIG. Analysis datasets should be used to create and to support the results in clinical study reports, Integrated Summaries of Safety (ISS), and Integrated Summaries of Efficacy (ISE), as well as other analyses required for a thorough regulatory review. Analysis datasets can contain imputed data or data derived from SDTM datasets.

#### **4.1.2.2 General Considerations**

Generally, ADaM facilitates FDA review. However, it does not always provide data structured in a way that supports all of the analyses that should be submitted for review. For example, ADaM structures do not support simultaneous analysis of multiple dependent variables or correlation analysis across several response variables. Therefore, sponsors should, as needed, supplement their ADaM datasets after discussions with the specific review division.

One of the expected benefits of analysis datasets that conform to ADaM is that they simplify the programming steps necessary for performing an analysis. As noted above, ADaM datasets should be derived from the data contained in the SDTM datasets. There are features built into the ADaM standard that promote traceability from analysis results to ADaM datasets and from ADaM datasets to SDTM. To ensure traceability, all SDTM variables utilized for variable derivations in ADaM should be included in the ADaM datasets when practical. Each analysis dataset that is submitted should be described accordingly with complete metadata in the define.xml file (See section 4.1.4.5).

#### **4.1.2.3 Key Efficacy and Safety Variables**

Sponsors should submit ADaM datasets to support key efficacy and safety analyses. At least one dataset should be referenced in the define file as containing the primary efficacy variables. Further, variables pertaining to the primary and secondary endpoints of a trial, along with their derivations (as applicable), should be provided as well as documented appropriately (i.e., variable-level metadata or parameter value-level metadata) in the define file.

#### **4.1.2.4 Timing Variables**

A variable for relative day of measurement or event, along with timing variables for visit should be included when an analysis dataset contains multiple records per subject (i.e., repeated measures data).

#### **4.1.2.5 Core Variables**

Core variables, which include covariates presented in the study protocol that are necessary to analyze data, should be included in each ADaM dataset, and are typically already included in the Subject Level Analysis Data (ADSL) dataset (See section 4.1.2.9.1). The core variables included in an ADaM dataset should be necessary for the analysis need in that dataset. Examples of core variables include study/protocol number, center/site number, geographic region, country, treatment assignment information, sex, age, race, analysis population flags (e.g., Intent-to-Treat (ITTFL), Full Analysis Set (FASFL), Safety (SAFFL), Per-Protocol (PPROTFL)), and other important baseline demographic variables. Note that all variables that contain coded data should be accompanied by a variable that provides the decoded information.

In addition, it is important to note that SDTM datasets do not have core variables (such as demographic and population variables) repeated across the different domains. The duplication of core variables across various domains can be fulfilled through their inclusion in the corresponding analysis datasets. For example, the SDTM adverse event dataset does not allow for the inclusion of variables such as treatment arm, sex, age, or race. These and other variables should be included in an adverse event analysis dataset.

#### **4.1.2.6 Dates**

Dates should be formatted as numeric in the analysis datasets. In addition to including dates formatted as International Standards Organization (ISO) 8601, corresponding numeric dates should be included in the analysis datasets. The specific date of reference used to calculate numeric dates varies by software; hence this date of reference should be specified within the ADRG. In the event of partial dates, imputation should be performed only for dates required for analysis according to the statistical analysis plan, and appropriate corresponding ADaM imputation flags should be utilized.

#### **4.1.2.7 Labels**

Each dataset should be described by an internal label that is shown in the define.xml file. The label names of analysis datasets should be different from those of the SDTM datasets. For example, the SDTM adverse event dataset (AE) and the analysis adverse event dataset (e.g., ADAE) should not share the exact same dataset label, such as “Adverse Events.”

#### **4.1.2.8 Software Programs**

Sponsors should provide the software programs used to create all ADaM datasets along with the tables and figures associated with primary and secondary efficacy analyses in order to help reviewers to better understand how the datasets, tables and figures were created. The specific software utilized should be specified in the ADRG. These software programs do not need to be executable, but they do need to

provide sufficient information to help understand how the work was done. Any submitted programs (scripts) generated by an analysis tool should be provided as ASCII text files or PDF files, e.g., adsl.sas should be submitted as either adsl.txt or adsl.pdf.

#### **4.1.2.9 ADaM Dataset Specifications**

##### **4.1.2.9.1 Subject Level Analysis Data**

Subject Level Analysis Data (ADSL) is the subject-level analysis dataset for ADaM. All submissions containing standard data should contain an ADSL file for each study. In addition to the variables specified for ADSL in the ADaMIG such as those previously listed in the core variables section (See section 4.1.2.5) above, the sponsor should include multiple additional variables representing various important baseline subject characteristics / covariates presented in the study protocol. Some examples of baseline characteristics / covariates include, but are not limited to, disease severity scores such as Acute Physiology and Chronic Health Evaluation (APACHE) scores,<sup>24</sup> baseline organ function measurements such as calculated creatinine clearance or Forced Expiratory Volume in 1 second (FEV1); range categories for continuous variables; and numeric date variables in non-ISO formats.

##### **4.1.2.9.2 Imputed Data**

When data imputation is utilized in ADaM, sponsors should submit the relevant supporting documentation (i.e., define.xml and ADRG) explaining the imputation methods.

#### **4.1.3 Standard for Exchange of Nonclinical Data**

##### **4.1.3.1 Definition**

The Standard for Exchange of Nonclinical Data (SEND) provides the organization, structure, and format of standard nonclinical (animal toxicology studies) tabulation datasets for regulatory submission. Currently, the SEND Implementation Guide (SENDIG) supports single-dose general toxicology, repeat-dose general toxicology, and carcinogenicity studies.

##### **4.1.3.2 General Considerations**

The SENDIG provides specific domain models, assumptions, conformance and business rules, and examples for preparing standard tabulation datasets that are based on the SDTM. If there is uncertainty regarding SEND implementation, the sponsor should discuss the issue with the review division.

The ideal time to implement SEND is prior to the conduct of the study as it is very important that the results presented in the accompanying study report be traceable back to the original data collected.

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<sup>24</sup> Knaus WA, Draper EA, Wagner DP, Zimmerman JE (1985). "APACHE II: a severity of disease classification system." *Critical Care Medicine*, 13 (10): 818–829.

#### **4.1.3.3 SEND Domain Specification**

##### **SUPPQUAL (Supplemental Qualifier)**

A SUPPQUAL dataset is a special SEND dataset that contains non-standard variables which cannot be represented in the existing SEND domains. Discussion with the review division should occur if the sponsor intends to include important variables (i.e., that support key analyses) in SUPPQUAL datasets and this should be reflected in the SDRG.

Currently, SUPPQUAL should be used to capture some collected information (e.g., pathology modifiers) until the SEND is further refined to adequately represent such information.

##### **Microscopic Findings (MI) Domain**

Sponsors should ensure that the transformation of findings from MIORES to MISTRESC closely adheres to the instructions in the SENDIG. Modifiers for which there are variables available (e.g. MISEV, MILAT, etc.) should be placed appropriately. There should be no severities (e.g., minimal, mild, etc.) included in MISTRESC. Sponsors should use the VISITDY variable if postmortem findings which were intended to be analyzed together were collected across multiple study days.

##### **Macroscopic Findings (MA) Domain**

Sponsors should use the VISITDY variable if postmortem findings which were intended to be analyzed together were collected across multiple study days.

##### **Custom Domains**

The SENDIG allows for the creation of custom domains if the data do not fit into an existing domain.

##### **Tumor Dataset**

Carcinogenicity studies should include an electronic dataset of tumor findings to allow for a complete review. At this time sponsors should include a tumor.xpt file while following the specification in the SENDIG for its creation regardless of whether or not the study is in SEND format (See [www.cdisc.org/send](http://www.cdisc.org/send)).

#### **4.1.4 General Considerations: SDTM, SEND, and/or ADaM**

##### **4.1.4.1 Variables in SDTM and SEND: Required, Expected, and Permissible**

CDISC data standards categorize SDTM and SEND variables as being Required, Expected, and Permissible. In some instances, sponsors have interpreted Permissible variables as being optional and, in other cases, sponsors have excluded Expected variables. For the purposes of SDTM and SEND submissions, all Required,

Expected, and Permissible variables that were collected, plus any variables that are used to compute derivations, should be submitted.<sup>25</sup>

SDTM datasets should not contain imputed data. FDA recognizes that SDTM contains certain operationally derived variables that have standard derivations across all studies (e.g., --STDY, EPOCH). If the data needed to derive these variables are missing, then these variables cannot be derived and the values should be null. The following are examples of some of the Permissible and Expected variables in SDTM and SEND that should be included, if available:

1. Baseline flags (e.g., last non-missing value prior to first dose) for Laboratory results, Vital Signs, ECG, Pharmacokinetic Concentrations, and Microbiology results. Currently, for SDTM, baseline flags should be submitted if the data were collected or can be derived.
2. EPOCH designators. Please follow CDISC guidance for terminology.<sup>26</sup> The variable EPOCH should be included for clinical subject-level observation (e.g., adverse events, laboratory, concomitant medications, exposure, vital signs). This will allow the reviewer to easily determine during which phase of the trial the observation occurred (e.g., screening, on-therapy, follow-up), as well as the actual intervention the subject experienced during that phase.
3. Whenever --DTC, --STDTC or --ENDTC, which have the role of timing variables, are included, the matching Study Day variables (--DY, --STDY, or --ENDY, respectively) should be included. For example, in most Findings domains, --DTC is Expected, which means that --DY should also be included. In the Subject Visits domain, SVSTDTC is Required and SVENDTC is Expected; therefore, both SVSTDY and SVENDY should be included.

#### **4.1.4.2 Dates in SDTM and SEND**

Dates in SDTM and SEND domains should conform to the ISO 8601 format. Examples of how to implement dates are included in the SDTMIG and SENDIG.<sup>27</sup>

#### **4.1.4.3 Naming Conventions in SDTM and SEND**

Naming conventions (variable name and label) and variable formats should be followed as specified in the SDTMIG and SENDIG.

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<sup>25</sup> See CDISC SDTM Implementation Guide at [www.cdisc.org](http://www.cdisc.org) for additional information on variables referenced throughout this Guide

<sup>26</sup> See <http://www.cancer.gov/cancertopics/terminologyresources/page6>.

<sup>27</sup> See <http://www.cdisc.org>

#### **4.1.4.4 SDTM and SEND Versions**

When submitting clinical and nonclinical data, sponsors should not mix versions within a study. As noted above, the *Standards Catalog* lists the versions that are supported by FDA.

Conversions to one standardized version should be described in the SDRG, including the rationale for the conversion.

#### **4.1.4.5 Data Definition Files for SDTM, SEND, and ADaM**

The data definition file, i.e., define file, describes the metadata of the submitted electronic datasets, and is considered arguably the most important part of the electronic dataset submission for regulatory review. This data definition specification for submitted datasets defines the metadata structures that should be used to describe the datasets and variables. An insufficiently documented define file is a common deficiency that reviewers have noted. Consequently, the sponsor needs to provide complete detail in this file, especially for the specifications pertaining to derived variables. In addition, sponsors should also make certain that the code list and origin for each variable are clearly and easily accessible from the define file. The version of any external dictionary should be clearly stated both in the define file and, where possible, in the updated Trial Summary (TS) domain (SDTMIG 3.1.2 or greater; SENDIG 3.0 or greater). The internal dataset label should also clearly describe the contents of the dataset. For example, the dataset label for an efficacy dataset might be “Time to Relapse (Efficacy).”

Separate define files should be included for each type of electronic dataset submission, i.e., a separate define file for the SDTM datasets, a separate define file for the SEND datasets, and a separate define file for the ADaM datasets. The define file should be submitted in XML format, i.e., a properly functioning define.xml<sup>28</sup>. In addition to the define.xml, a printable define.pdf should be provided if the define.xml cannot be printed<sup>29</sup>. To confirm that a define.xml is printable within the CDER IT environment, it is recommended that the sponsor submit a test version to [cdereadata@fda.hhs.gov](mailto:cdereadata@fda.hhs.gov) prior to application submission. If a define.xml version 2.0 or later version is submitted, then a define.pdf does not need to be included in the submission. The *Standards Catalog* lists the currently supported version(s) of define.xml. Sponsors should include a reference to the style sheet as defined in the specification and place the corresponding style sheet in the same submission folder as the define.xml file.

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<sup>28</sup> See <http://www.cdisc.org/define-xml>

<sup>29</sup> Detailed FDA PDF specifications are located on FDA’s Electronic Common Technical Document (eCTD) Web site, <http://www.fda.gov/drugs/developmentapprovalprocess/formsubmissionrequirements/electronic submissions/ucm153574.htm>

#### **4.1.4.6 Annotated Case Report Form (aCRF) for SDTM**

An Annotated Case Report Form (aCRF) is a PDF document that maps the clinical data collection fields used to capture subject data (electronic or paper) to the corresponding variables or discrete variable values contained within the SDTM datasets. Regardless of whether the clinical database is legacy or SDTM compliant, an aCRF should be submitted. The aCRF should be provided as a PDF with the file name “acrf.pdf.”<sup>30</sup> The SDTM Metadata Submission Guidelines should be used for additional information on annotated CRFs.<sup>31</sup>

The aCRF should include treatment assignment forms, when applicable, and should map each variable on the CRF to the corresponding variables in the datasets (or database). The aCRF should include the variable names and coding for each CRF item.

When data are recorded on the CRF but are not submitted, the CRF should be annotated with the text "NOT SUBMITTED." There should be an explanation in the SDRG stating why data have not been submitted.

## **5. Therapeutic Area Standards**

### **5.1 General**

The following SDTM domains associated with the listed therapeutic area user guide have not completed testing and acceptance and are not supported at this time.

<b>SDTM IG Domain</b>	<b>Therapeutic Area User Guide</b>
1. Healthcare Encounters	Cardiovascular Studies, 1.0; Polycystic Kidney Disease, 1.0; Asthma, 1.0
2. Microscopic Findings	Tuberculosis, 1.0; Parkinson's, 1.0
3. Morphology	Cardiovascular Studies, 1.0; Parkinson's, 1.0; Polycystic Kidney Disease, 1.0; Alzheimer's, 1.0; Multiple Sclerosis, 1.0
4. Procedures	Cardiovascular Studies, 1.0; Polycystic Kidney Disease, 1.0; Alzheimer's, 1.0
5. Reproductive System	Polycystic Kidney Disease, 1.0
6. Disease Response	Tuberculosis, 1.0
7. Skin Response	Asthma, 1.0

<sup>30</sup> Previously acrf.pdf was called blankcrf.pdf.

<sup>31</sup> See Study Data Tabulation Model Metadata Submission Guidelines (SDTM-MSG) (<http://www.cdisc.org/sdtm>).



## **6. Terminology**

### **6.1 General**

Common dictionaries should be used across all clinical studies and throughout the submission for each of the following: adverse events, concomitant medications, procedures, indications, study drug names, and medical history. FDA recommends that sponsors use, where appropriate, the terminologies supported and listed in the *Standards Catalog*. It is important that coding standards, if they exist, be followed (e.g., ICH MedDRA Term Selection: Points-to-Consider document). Frequently, sponsors submit data that do not conform to terminology standards, for example, misspelling of MedDRA or WHO Drug terms, lack of conformance to upper / lower case, or the use of hyphens. All controlled terms submitted in datasets should conform to the exact case and spelling used by the terminology maintenance organization (e.g., MedDRA, CDISC controlled terminology). These conformance issues make it difficult to use or develop automated review and analysis tools. The use of a dictionary that is sponsor-defined or an extension of a standard dictionary should be avoided if possible, but, if essential, its use should be documented in the `define.xml` file and the SDRG.

#### **6.1.1 Controlled Terminologies**

Controlled terminology standards are an important component of study data standardization and are a critical component of achieving semantically interoperable data exchange (See Appendix). Generally, controlled terminology standards specify the key concepts that are represented as definitions, preferred terms, synonyms, codes, and code system.

The analysis of study data is greatly facilitated by the use of controlled terms for clinical or scientific concepts that have standard, predefined meanings and representations. Standard terminology for adverse events perhaps represents the earliest example of using standards for study data. For example, *myocardial infarction* and *heart attack* are synonyms, and as such should be mapped to the same term in a standard dictionary. This level of standardization facilitates an efficient analysis of events that are coded to the standard term. In electronic study data submissions, sponsors should provide the actual verbatim terms that were collected (e.g., on the case report form), as well as the coded term.

Controlled terminology is also useful when consistently applied across studies to facilitate integrated analyses (that are stratified by study) and cross-study comparative analyses (e.g., when greater statistical power is needed to detect important safety signals). Cross-study comparisons and pooled integrated analyses occasionally provide critical information for regulatory decisions, such as statistical results that

support effectiveness,<sup>32</sup> as well as important information on exposure-response relationships<sup>33</sup> and population pharmacokinetics<sup>34</sup>.

### **6.1.2 Use of Controlled Terminologies**

FDA recognizes that studies are conducted over many years, during which time versions of a terminology may change. Generally, FDA expects sponsors to use the most current version of an FDA-supported terminology available at the time of coding. It is acceptable to have different studies use different versions of the same dictionary within the same application. There are some situations where it may be acceptable to use a single older version of a dictionary across multiple studies, even though that version may not be the most current for the later studies. The study data submission should describe the impact, if any, of the older version on the study results in the SDRG. For example, if the sponsor anticipates pooling coded data across multiple studies, then it may be desirable to use a single version across those studies to facilitate pooling. If a sponsor selects this approach, then the approach and the justification should be documented in the *Standardization Plan*, or in an update to the plan.

Regardless of the specific versions used for individual studies, pooled analyses of coded terms across multiple studies (e.g., for an integrated summary of safety) should be conducted using a single version of a terminology. This will ensure a consistent and coherent comparison of clinical and scientific concepts across multiple studies. Sponsors should specify the terminologies and versions used in the study in the SDRG.

### **6.1.3 Maintenance of Controlled Terminologies**

The use of supported controlled terminologies is recommended wherever available. If a sponsor identifies a concept for which no standard term exists, FDA recommends that the sponsor submit the concept to the appropriate terminology maintenance organization as early as possible to have a new term added to the standard dictionary. FDA considers this *good terminology management practice*. The creation of custom terms (i.e., so-called *extensible* code lists) for a submission is discouraged, because this does not support semantically interoperable study data exchange. Furthermore,

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<sup>32</sup> See the guidance for industry *Providing Clinical Evidence of Effectiveness for Human Drugs and Biological Products*, available at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/ucm072008.pdf>. We update guidances periodically. To make sure you have the most recent version of a guidance, check the FDA Drugs guidance Web page at

<http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/default.htm>.

<sup>33</sup> See the guidance for industry *Exposure-Response Relationships — Study Design, Data Analysis, and Regulatory Applications*, <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/ucm072109.pdf>.

<sup>34</sup> See the guidance for industry *Population Pharmacokinetics*, available at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/ucm072137.pdf>.

the use of custom or “extensible” code lists should not be interpreted to mean that sponsors may substitute their own nonstandard terms in place of existing equivalent standardized terms. Terminology maintenance organizations generally have well-defined change control processes. Sponsors should allow sufficient time for a proposed term to be reviewed and included in the terminology, as it is desirable to have the term incorporated into the standard terminology before the data are submitted. If custom terms cannot be avoided, the submitter should clearly identify and define them within the submission, reference them in the SDRG, and use them consistently throughout the application.

If a sponsor identifies an entire information domain<sup>35</sup> for which FDA has not accepted a specific standard terminology, they may select a standard terminology to use, if one exists. FDA recommends that sponsors include this selection in the *Standardization Plan* (See section 2.1) or in an update to the existing plan, and reference it in the SDRG. If no controlled terminology exists, the sponsor may define custom terms. The non-FDA supported terms (whether from a non-supported standard terminology or sponsor-defined custom terms) should then be used consistently throughout all relevant studies within the application.

## **6.2 CDISC Controlled Terminology**

Sponsors should use the terminologies and code lists in the CDISC Controlled Terminology, which can be found at the NCI (National Cancer Institute) Enterprise Vocabulary Services.<sup>36</sup> For variables for which no standard terms exists, or if the available terminology is insufficient, the sponsor should propose its own terms. The sponsor should provide this information in the define.xml file and in the SDRG.

## **6.3 Adverse Events**

### **6.3.1 MedDRA**

#### **6.3.1.1 General Considerations**

MedDRA should be used for coding adverse events. The spelling and capitalization of MedDRA terms should match the way the terms are presented in the MedDRA dictionary (e.g., spelling and case). Common errors that have been observed include the incorrect spelling of a System Organ Class (SOC) and other MedDRA terms.

Generally, the studies included in an application are conducted over many years and may have used different MedDRA versions. To avoid potential confusion or incorrect results, the preparation of the adverse event dataset for the ISS should include MedDRA Preferred Terms from a single version of MedDRA. The reason for an ISS based on a single version of MedDRA is that reviewers often analyze adverse events across studies, including the use of Standardized MedDRA Queries.<sup>37</sup> In

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<sup>35</sup> By *information domain*, we mean a logical grouping of clinical or scientific concepts that are amenable to standardization (e.g., adverse event data, laboratory data, histopathology data, imaging data).

<sup>36</sup> See <http://www.cancer.gov/cancertopics/terminologyresources/page6>.

<sup>37</sup> See <http://www.meddra.org/standardised-meddra-queries>.

addition, sponsors should use the MedDRA-specified hierarchy of terms. The SDTM variables for the different hierarchy levels should represent MedDRA-specified primary SOC-coded terms.

## **6.4 Medications**

### **6.4.1 FDA Unique Ingredient Identifier**

#### **6.4.1.1 General Considerations**

The FDA Unique Ingredient Identifier (UNII)<sup>38</sup> should be used to identify active ingredients (specifically, active moieties) that are administered to investigational subjects in a study (either clinical or nonclinical). This information should be provided in the SDTM Trial Summary (TS) domain. UNIs should be included for all active moieties of investigational products (TSPARM=TRT or TRTUNII), active comparators (TSPARM=COMPTRT), and any protocol-specified background treatments (TSPARM=CURTRT).

If a medicinal product has more than one active moiety, then multiple records in TS should be provided, one for each active moiety. For example, if the investigational product is Bactrim (a combination of sulfamethoxazole and trimethoprim), then TS will contain two records for TSPARM=TRT: one for sulfamethoxazole and one for trimethoprim.

The preferred substance names and UNII codes can be found by searching FDA's Substance Registration System, hosted by the National Library of Medicine.<sup>39</sup> We recognize that unapproved substances may not yet have registered UNII codes. We recommend that sponsors obtain UNII codes for unapproved substances as early in drug development as possible, so that relevant information, such as study data, can be unambiguously linked to those substances.

### **6.4.2 WHO Drug Dictionary**

#### **6.4.2.1 General Considerations**

World Health Organization (WHO) Drug Dictionary<sup>40</sup> is a dictionary maintained and updated by Uppsala Monitoring Centre. WHO Drug Dictionary contains unique product codes for identifying drug names and evaluating medicinal product information, including active ingredients and therapeutic uses.

Typically, WHO Drug is used to code concomitant medications. --DECOD should be populated with the generic name from the WHO dictionary, and --CLAS populated with the drug class, if the utilized dictionary codes drugs to a single class. When using WHODRUG, generally, --CLAS would not be filled because a drug may have multiple classes. However, one Anatomic Therapeutic Code (ATC) level 4 code

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<sup>38</sup> See <http://www.fda.gov/ForIndustry/DataStandards/SubstanceRegistrationSystem-UniqueIngredientIdentifierUNII/>

<sup>39</sup> The Substance Registration System can be accessed at <http://fdasis.nlm.nih.gov/srs>

<sup>40</sup> See <http://www.who-umc.org/>

could be mapped to --CLAS and the remainder of the ATC codes could be placed in SUPPCM.

## **6.5 Pharmacologic Class**

### **6.5.1 National Drug File -- Reference Terminology**

#### **6.5.1.1 General Considerations**

The Veterans Administration's National Drug File – Reference Terminology (NDF-RT)<sup>41</sup> should be used to identify the pharmacologic class(es) of all active investigational substances that are used in a study (either clinical or nonclinical). This information should be provided in the SDTM Trial Summary (TS) domain. The information should be provided as one or more records in TS, where TSPARM=PCLAS.

Pharmacologic class is a complex concept that is made up of one or more component concepts: mechanism of action (MOA), physiologic effect (PE), and chemical structure (CS).<sup>42</sup> The established pharmacologic class is generally the MOA, PE, or CS term that is considered the most scientifically valid and clinically meaningful. Sponsors should include in TS the established pharmacologic class of all active moieties of investigational products used in a study. FDA maintains a list of established pharmacologic classes of approved moieties.<sup>43</sup> If the established pharmacologic class is not available for an active moiety, then the sponsor should discuss the appropriate MOA, PE, and CS terms with the review division. For unapproved investigational active moieties where the pharmacologic class is unknown, the PCLAS record may not be available.

## **6.6 Indication**

### **6.6.1 SNOMED CT**

#### **6.6.1.1 General Considerations**

The International Health Terminology Standards Organization's (IHTSDO) Systematized Nomenclature of Medicine – Clinical Terms (SNOMED CT)<sup>44</sup> should be used to identify the medical condition or problem that the investigational product in a study is intended to affect (treat, diagnose or prevent, i.e., the indication). This information should be provided in the SDTM Trial Summary (TS) domain as a record where TSPARM=INDIC and TSPARM=TDIGRP. SNOMED CT was chosen to harmonize with Indication information in Structured Product Labeling (SPL)<sup>45</sup>. A

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<sup>41</sup> See <http://mor.nlm.nih.gov/download/rxnav/NdfrtAPIs.html#>

<sup>42</sup> See the guidance for industry and review staff *Labeling for Human Prescription Drug and Biologic Products —Determining Established Pharmacologic Class for Use in the Highlights of Prescribing Information*, available at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/ucm186607.pdf>.

<sup>43</sup> Available at <http://www.fda.gov/downloads/ForIndustry/DataStandards/StructuredProductLabeling/UCM346147.zip>

<sup>44</sup> <http://www.ihtsdo.org/snomed-ct/>.

<sup>45</sup> See <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/ucm163377.htm>.

reviewer should be able to take the indication term from product labeling and readily search for clinical or nonclinical studies of that indication without having to translate.

## **6.7 Laboratory Tests**

### **6.7.1 LOINC**

#### **6.7.1.1 General Considerations**

The Logical Observation Identifiers Names and Codes (LOINC) is a clinical terminology housed by the Regenstrief Institute.<sup>46</sup> LOINC codes are universal identifiers for laboratory and other clinical observations that enable semantically interoperable clinical data exchange. The laboratory portion of the LOINC database contains the categories of chemistry, hematology, serology, microbiology (including parasitology and virology), toxicology, and more.

The SDTM already supports the exchange of LOINC codes using the LBLOINC variable.

## **7. Electronic Submission Format**

Study datasets and their supportive files should be organized into a specific file directory structure when submitted in the eCTD<sup>47</sup> format (See Figure 1 and Table 2 below). Note that this structure is distinct from the eCTD headings and hierarchy folder structure, and does not affect it. Submission of files within the appropriate folders allows automated systems to detect and prepare datasets for review, and minimizes the need for manual processing.

The define.xml and supportive style sheet should reside in the same folder as the datasets they pertain to (e.g., for SDTM, place in “tabulations\sdm”). Do not submit empty file folders. Do not submit additional subfolders. If you feel that additional folders are needed, please consult with the appropriate center in advance for guidance.

If you need to split a file that exceeds file size limits (See section 3.3.2), you should submit the smaller split files in the “split” sub-folder in addition to the larger non-split file in the original data folder. There is no need for a second define.xml file to be submitted within the split subfolder.

All datasets should be referenced in the eCTD XML backbone. Datasets included within the eCTD should be accurately tagged within a study tagging file to ensure proper identification and organization.<sup>48</sup> The file folder structure for study datasets

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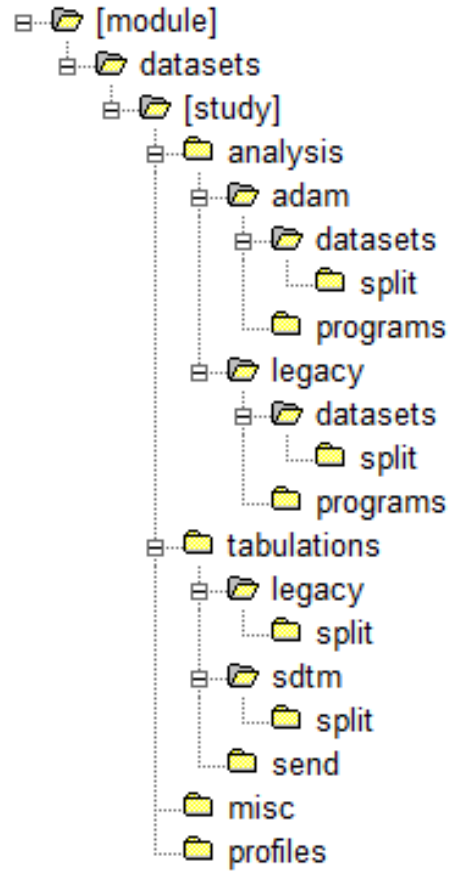
<sup>46</sup> See <http://www.regenstrief.org/>

<sup>47</sup> See <http://www.ich.org/products/ctd.html>.

<sup>48</sup> See “The eCTD Backbone File Specification for Study Tagging Files” (<http://www.fda.gov/downloads/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/UCM163560.pdf>) for further details.





















is summarized in Figure 1. Table 2 provides the study dataset and file folder structure and associated description.

**Figure 1: Folder Structure for Study Datasets**





**Table 2: Study Dataset and File Folder Structure and Description**

Folder Name	Folder Level	Description/Contents
 [module]	1	Refers to the eCTD module in which study data is being submitted. Name this folder m4 for nonclinical data and m5 for clinical data. Do not place files at this level.
 datasets	2	Resides within the module folder as the top-level folder for study data (nonclinical or clinical) being submitted for the specified module (m4 or m5). Do not place files at this level.
 [study]	3	Name this folder with the study identifier or analysis type performed (e.g., study123, iss, ise). Do not place files at this level.
 analysis	4	Contains folders for analysis datasets and software programs; arrange in designated level 6 subfolders. Do not place files at this level.
 adam	5	Contains subfolders for ADaM datasets and corresponding software programs. Do not place files at this level.
 datasets	6	Place ADaM datasets in this subfolder.
 split	7	Place any split ADaM datasets in this subfolder.
 programs	6	Place software programs for ADaM datasets, tables and figures in this subfolder.
 legacy	5	Contains legacy formatted analysis datasets and corresponding software programs. Do not place files at this level.
 datasets	6	Place legacy analysis datasets in this subfolder.
 split	7	Place split legacy analysis datasets in this subfolder.
 programs	6	Place software programs for legacy analysis datasets, tables and figures in this subfolder.
 misc	4	Place miscellaneous datasets that don't qualify as analysis, profile, or tabulation datasets in this subfolder. This subfolder was formerly named "listings".
 profiles	4	Place patient profiles in this subfolder.
 tabulations	4	Contains subfolders for tabulation datasets. Do not place files at this level.
 legacy	5	Place legacy (non-standardized) tabulation datasets in this folder.
 split	6	Place any split legacy tabulations datasets in this subfolder.
 sdtm	5	Place SDTM tabulation datasets in this subfolder. Should only be used in m5 for clinical data.
 split	6	Place any split SDTM files in this subfolder.
 send	5	Place SEND tabulation datasets in this subfolder. Should only be used in m4 for animal data.



## 8. Data Validation and Traceability

### 8.1 Definition of Data Validation

For purposes of this Guide, data validation is a process that attempts to ensure that submitted data are both compliant and useful. *Compliant* means the data conform to the applicable and required data standards. *Useful* means that the data support the intended use (i.e., regulatory review and analysis).

Data validation is one method used to assess submission data quality. Standardized data do not ensure quality data, but they do make it easier to assess some aspects of data quality by facilitating the automation of various data checks.

Data validation relies on a set of validation rules that are used to verify that the data conform to a minimum set of quality standards. The data validation process can identify data issues early in the review that may adversely affect the use of the data. FDA recognizes that it is impossible or impractical to define *a priori* all the relevant validation rules for any given submission. Sometimes serious issues in the submitted data are only evident through manual inspection of the data and may only become evident once the review is well under way. Often these issues are due to problems in data content (i.e., *what* was or was not submitted, or issues with the collection of original source data), and not necessarily *how* the data were standardized.

### 8.2 Study Data Validation Rules

#### 8.2.1 Types of Data Validation Rules

Generally, FDA recognizes two types of validation rules:

**Conformance validation:** These rules help ensure that the data conform to the data standards. For example, a conformance validation rule for CDISC SDTM data would check that the value in the Domain column of all datasets matches the name of the domain.

**Quality checks:** These checks help to ensure the data will support meaningful analysis. For example, a quality check for a particular human study may require that each value for AGE fall within a pre-specified human physiologic range.

Once a data standard is defined, the conformance validation rules are generally static. They are not expected to change substantially unless the standard itself changes. However, new analysis requirements or specific studies may suggest additional quality checks and these will be incorporated into data validation processes.

## **8.2.2 Support on Data Validation Rules**

The Standards Web page<sup>49</sup> provides links to the currently available validation rules, i.e. both conformance rules and quality checks.

Sponsors should validate their study data before submission using the published validation rules and either correct any validation errors or explain in the Reviewer's Guide (SDRG or ADRG) why certain validation errors could not be corrected. The recommended pre-submission validation step is intended to minimize the presence of validation errors at the time of submission.

Data validation is used by FDA to inform review staff of potential problems in using the data, and to assess the usefulness of the rules. If applicable, FDA may report important data validation errors to the sponsor for correction.

## **8.3 Study Data Traceability**

### **8.3.1 Overview**

An important component of a regulatory review is an understanding of the provenance of the data (i.e., traceability of the sponsor's results back to the CRF data). Traceability permits an understanding of the relationships between the analysis results, analysis datasets, tabulation datasets, and source data. Traceability enables the reviewer to accomplish the following:

- Understand the construction of analysis datasets
- Determine the observations and algorithm(s) used to derive variables
- Understand how the confidence interval or the p-value was calculated in a particular analysis

Based upon reviewer experience, establishing traceability is one of the most problematic issues associated with legacy study data converted to standardized data. If the reviewer is unable to trace study data from the data collection of subjects participating in a study to the analysis of the overall study data, then the regulatory review of a submission may be compromised. Traceability can be enhanced when studies are prospectively designed to collect data using a standardized CRF, e.g., CDASH.

As noted in section 1.1, the submission of standardized study data will be required according to the timetable specified in the eStudy Data guidance. During the transition period to required study data standards, FDA recognizes that some study data (i.e., legacy data) submissions may not conform to FDA-supported study data standards and may need to be converted.

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<sup>49</sup> The Standards Web page can be accessed at <http://www.fda.gov/forindustry/datastandards/studydatastandards/default.htm>.

### 8.3.2 Legacy Study Data Conversion to Standardized Study Data

Sponsors should use processes for legacy data conversion that account for traceability. Generally, a conversion to a standard format will map every data element as originally collected to a corresponding data element described in a standard. Some study data conversions will be straightforward and will result in all data converted to a standardized format. In some instances, it may not be possible to represent a collected data element as a standardized data element. In these cases, there should be an explanation in the SDRG as to why certain data elements could not be fully standardized or were otherwise not included in the standardized data submission. The legacy data (i.e., aCRF, legacy tabulation data, and legacy analysis data) may be needed in addition to the submission of converted data.

In cases where the data were collected on a Case Report Form (CRF) or electronic CRF but were not included in the converted datasets, the omitted data should be apparent on the annotated CRF and described in the SDRG. The tabular list of studies in the *Standardization Plan* should indicate which studies contained previously collected non-standard data that were subsequently converted to a standard format.

#### 8.3.2.1 Traceability Issues with Legacy Data Conversion

FDA does not recommend a particular approach to legacy study data conversion, but rather explains the issues that should be addressed so that the converted data are traceable and adequate to support review.

Table 3 presents some of the issues that can be observed during a review when legacy study data are converted to SDTM and submitted with legacy analysis datasets.

**Table 3: Traceability Issues: Legacy Data Conversion to SDTM Only**

1. Limited ability to determine location of collected CRF variables in the converted SDTM data unless the legacy aCRF is re-annotated.
2. Limited traceable path from SDTM to the legacy analysis data.
3. Limited ability to replicate/confirm legacy analysis datasets (i.e., analysis variable imputation or derived variables) using SDTM datasets.
4. Limited ability to confirm derivation of intermediate analysis datasets or custom domains.
5. Difficulty in understanding the source or derivation methods for imputed or derived variables in integrated/pooled data, supplemental qualifiers, and related records.

Table 4 presents the issues when legacy study data and legacy analysis data are independently converted to SDTM and ADaM formats, respectively, rather than ADaM datasets being created directly from the SDTM datasets (converted from legacy study data).

**Table 4: Traceability Issues: Independent Legacy Data Conversion to SDTM and ADaM**

Issues
1. Limited ability to determine location of collected CRF variables in the converted SDTM data unless the legacy aCRF is re-annotated.
2. Limited traceable path from SDTM to the legacy analysis data.
3. Limited ability to replicate/confirm legacy analysis datasets (i.e., analysis variable imputation or derived variables) using SDTM datasets.
4. Limited ability to confirm derivation of intermediate analysis datasets or custom domains.
5. Limited traceable path from SDTM to the ADaM datasets.
6. Limited ability to replicate ADaM datasets (i.e., analysis variable imputation or derived variables) using SDTM datasets.
7. Limited traceable path from ADaM to the Tables, Figures and the Clinical Study Report (CSR).
8. Difficulty in understanding the source or derivation methods for imputed or derived variables in integrated/pooled data, supplemental qualifiers, and related records.

Table 5 presents the issues when legacy data are converted to SDTM and ADaM formats in sequence (i.e., converting legacy study data to SDTM and then creating ADaM from the SDTM). The key concern is the traceability from ADaM to the Tables, Figures and CSR.

**Table 5: Traceability Issues: Legacy Data Conversion to SDTM and ADaM in Sequence**

1. Limited ability to determine location of collected CRF variables in the converted SDTM data unless the legacy aCRF is re-annotated.
2. Limited traceable path from SDTM to the legacy analysis data.
3. Limited ability to replicate/confirm legacy analysis datasets (i.e., analysis variable imputation or derived variables) using SDTM datasets.
4. Limited ability to confirm derivation of intermediate analysis datasets or custom domains.
5. Limited traceable path from ADaM to the Tables, Figures and the CSR.
6. Difficulty in understanding the source or derivation methods for imputed or derived variables in integrated/pooled data, supplemental qualifiers, and related records.

### **8.3.2.2 Legacy Data Conversion Plan and Report**

Sponsors should evaluate the decision involved in converting previously collected non-standardized data (i.e., legacy study data) to standardized data (i.e., SDTM, SEND, and ADaM). Sponsors should provide the explanation and rationale for the study data conversion in the SDRG. To mitigate traceability issues when converting legacy data, FDA recommends the following procedures:

*Contains Nonbinding Recommendations*

1. Prepare and Submit a Legacy Data Conversion Plan and Report.
  - The plan should describe the legacy data and the process intended for the conversion.
  - The report should present the results of the conversions, issues encountered and resolved, and outstanding issues.
  - The plan and report should be provided in the SDRG.
2. Provide an aCRF, for clinical data, that maps the legacy data elements.
  - Sponsors should provide two separate CRF annotations, one based on the original legacy data, and the other based on the converted data (i.e., SDTM) when legacy datasets are submitted. The legacy CRF tabulation data should include all versions and all forms used in the study.
3. Record significant data issues, clarifications, explanations of traceability, and adjudications in the SDRG. For example, data were not collected or were collected using different/incompatible terminologies, or were collected but will not fit into, for example, SDTM format.
4. Legacy data (i.e., legacy aCRF, legacy tabulation data, and legacy analysis data) may be needed in addition to the converted data.

## Appendix: Data Standards and Interoperable Data Exchange

This appendix provides some of the guiding principles for the Agency's long-term study data standards management strategies. An important goal of standardizing study data submissions is to achieve an acceptable degree of *semantic interoperability* (discussed below). This appendix describes different types of interoperability and how data standards can support interoperable data exchange now and in the future.

At the most fundamental level, study data can be considered a collection of data elements and their relationships. A data element is the smallest (or *atomic*) piece of information that is useful for analysis (e.g., a systolic blood pressure measurement, a lab test result, a response to a question on a questionnaire).

A data value is by itself meaningless without additional information about the data (so called *metadata*). Metadata is often described as *data about data*. Metadata is structured information that describes, explains, or otherwise makes it easier to retrieve, use, or manage data.<sup>50</sup> For example, the number 44 itself is meaningless without an association with Hematocrit and the unit of measurement (e.g. "%"). Hematocrit in this example is metadata that further describes the data.

Just as it is important to standardize the representation of data (e.g., M and F for male and female, respectively), it is equally important to standardize the metadata. The expressions Hematocrit = 44; Hct = 44, or Hct Lab Test = 44 all convey the same information to a human, but an information system or analysis program will fail to recognize that they are equivalent because the metadata is not standardized. It is also important to standardize the definition of the metadata, so that the meaning of a Hematocrit value is constant across studies and submissions.

In addition to standardizing the data and metadata, it is important to capture and represent relationships (also called associations) between data elements in a standard way. Relationships between data elements are critical to understand or interpret the data. Consider the following information collected on the same day for one subject in a study:

Systolic Blood Pressure = 90 mmHg  
Position = standing  
Systolic Blood Pressure = 110 mmHg  
Time = 10:23 a.m.  
Time = 10:20 a.m.

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<sup>50</sup> Metadata is said to "give meaning to data" or to put data "in context." Although the term is now frequently used to refer to XML (extensible markup language) tags, there is nothing new about the concept of metadata. Data about a library book such as author, type of book, and the Library of Congress number, are metadata and were once maintained on index cards. SAS labels and formats are a rudimentary form of metadata, although they have not historically been referred to as metadata.

Position = lying

When presented as a series of unrelated data elements, they cannot reliably be interpreted. Once the relationships are captured, as shown below using arrows, the interpretation of a drop in systolic blood pressure of 20 mmHg while standing, and therefore the presence of clinical orthostatic hypotension, is possible. Standardizing study data therefore involves standardizing the data, metadata, and the representation of relationships.

Time = 10:20 a.m.  $\leftrightarrow$  Position = lying  $\leftrightarrow$  Systolic Blood Pressure = 110 mmHg  
Time = 10:23 a.m.  $\leftrightarrow$  Position = standing  $\leftrightarrow$  Systolic Blood Pressure = 90 mmHg

With these fundamental concepts of data standardization in mind, data standards can be considered in the context of interoperable data exchange.

### **Interoperability**

Much has been written about interoperability, with many available definitions and interpretations within the health care informatics community. In August 2006, the President signed an Executive Order mandating that the Federal Government use interoperable data standards for health information exchange.<sup>51</sup> Although this order was directed at Federal agencies that administer health care programs (and therefore not the FDA), it is relevant to this guidance because it defined interoperability for use by Federal agencies:

*“Interoperability” means the ability to communicate and exchange data accurately, effectively, securely, and consistently with different information technology systems, software applications, and networks in various settings, and exchange data such that clinical or operational purpose and meaning of the data are preserved and unaltered.*

Achieving interoperable study data exchange between sponsors and applicants and FDA is not an all-or-nothing proposition. Interoperability represents a continuum, with higher degrees of data standardization resulting in greater interoperability, which in turn makes the data more useful and increasingly capable of supporting efficient processes and analyses by the data recipient. It is therefore useful to understand the degree of interoperability that is desirable for standardized study data submissions.

In 2007, the Electronic Health Record Interoperability Work Group within Health Level Seven issued a white paper that characterized the different types of interoperability based on an analysis of how the term was being defined and used in actual practice.<sup>52</sup> Three types of interoperability were identified: technical, semantic, and process interoperability. A review of these three types provides insight into the desired level of interoperability for standardized study data submissions.

<sup>51</sup> See <http://www.cga.ct.gov/2006/rpt/2006-R-0603.htm>.

<sup>52</sup> See Coming to Terms: Scoping Interoperability for Health Care <http://www.hln.com/assets/pdf/Coming-to-Terms-February-2007.pdf>.

**Technical interoperability** describes the lowest level of interoperability whereby two different systems or organizations exchange data so that the data are useful. The focus of technical interoperability is on the conveyance of data, not on its meaning. Technical interoperability supports the exchange of information that can be used by a person but not necessarily processed further. When applied to study data, a simple exchange of nonstandardized data using an agreed-upon file format for data exchange (e.g., SAS transport file) is an example of technical interoperability.

**Semantic interoperability** describes the ability of information shared by systems to be understood, so that nonnumeric data can be processed by the receiving system. Semantic interoperability is a multi-level concept with the degree of semantic interoperability dependent on the level of agreement on data content terminology and other factors. With greater degrees of semantic interoperability, less human manual processing is required, thereby decreasing errors and inefficiencies in data analysis. The use of controlled terminologies and consistently defined metadata support semantic interoperability.

**Process interoperability** is an emerging concept that has been identified as a requirement for successful system implementation into actual work settings. Simply put, it involves the ability of systems to exchange data with sufficient meaning that the receiving system can automatically provide the right data at the right point in a business process.

An example of process interoperability in a regulatory setting is the ability to quickly and automatically identify and provide all the necessary information to produce an expedited adverse event report in a clinical trial upon the occurrence of a serious and unexpected adverse event. The timely submission of this information is required by regulation to support FDA's mandate to safeguard patient safety during a clinical trial. Process interoperability becomes important when particular data are necessary to support time-dependent processes.

Because the vast majority of study data are submitted after the study is complete, achieving process interoperability for study data submissions in a regulatory setting is relatively unimportant, at least for the foreseeable future. It is reasonable to conclude that it is most desirable to achieve *semantic interoperability* in standardized study data submissions.

In summary, the goal of standardizing study data is to make the data more useful and to support semantically interoperable data exchange between sponsors, applicants, and the FDA such that it is commonly understood by all parties.



## Glossary

The following list of acronyms and terms used in this Guide:

aCRF:	Annotated Case Report Form
ANDA:	Abbreviated New Drug Application
ADaM:	Analysis Data Model
ADRG	Analysis Data Reviewer's Guide
ADSL:	Subject Level Analysis Data
ASCII:	American Standard Code for Information Interchange
CBER:	Center for Biologics Evaluation and Research
CDASH:	Clinical Data Acquisition Standards Harmonization
CDER:	Center for Drug Evaluation and Research
CDISC:	Clinical Data Interchange Standards Consortium
CS:	Chemical Structure
Domain:	A collection of observations with a topic-specific commonality
eCTD:	Electronic Common Technical Document
ICH:	International Conference on Harmonisation
IND:	Investigational New Drug
ISE:	Integrated Summary of Efficacy
ISO:	International Organization for Standardization
ISO 8601:	ISO character representation of dates, date/times, intervals, and durations of time.
ISS:	Integrated Summary of Safety
ITT:	Intent-To-Treat
MedDRA:	Medical Dictionary for Regulatory Activities
MOA:	Mechanism of Action
NDA:	New Drug Application
NDF-RT:	National Drug File – Reference Terminology
PDF:	Portable Document Format
PE:	Physiologic Effect
SDRG	Study Data Reviewer's Guide
SDTM:	Study Data Tabulation Model
SNOMED:	Systematized Nomenclature of Medicine
UNII:	FDA Unique Ingredient Identifier
WHO:	World Health Organization
XML:	eXtensible Markup Language
XPORT:	SAS Transport Version 5